

Alfred R. Fabricant
FABRICANT LLP
411 Theodore Fremd Avenue,
Suite 206 South
Rye, New York 10580
Tel. (212) 257-5797
Fax (212) 257-5796
ffabricant@fabricantllp.com

*Attorneys for Defendant
Taasera Licensing LLC*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PALO ALTO NETWORKS, INC.,

Plaintiff,

v.

TAASERA LICENSING LLC and QUEST PATENT
RESEARCH CORPORATION,

Defendants.

Case No. 1:22-cv-02306-ER/SDA

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Taasera Licensing LLC's Motion to Dismiss Palo Alto Networks, Inc.'s ("Palo Alto" or "Plaintiff") First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement and all prior pleadings and proceedings had herein, Defendant Taasera Licensing LLC hereby moves this Court, at a time and date determined by the Court, for an order (i) pursuant to 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure (a) granting dismissal of Plaintiff Palo Alto Networks, Inc. First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement relative to Defendant Taasera Licensing LLC in its entirety, and (b) a determination of no alter ego exists between defendants Taasera Licensing LLC and Quest Patent Research Corporation, and

(ii) granting such other and further relief as the Court deems just and proper.

Dated: Rye, New York
June 23, 2021

Respectfully submitted,

FABRICANT LLP

By: /s/ Alfred R. Fabricant
Alfred R. Fabricant

*Attorneys for Defendant
Taasera Licensing LLC*

TO: Counsel for Defendant (by ECF)